

**Josh L. Roland**

+1 202 663 6266 (t)

+1 202 663 6363 (f)

josh.roland@wilmerhale.com

February 24, 2009

**BY ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: EB Docket 06-36 – Certification of Compliance with  
47 C.F.R. § 64.2001 *et seq.***

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), attached for filing is the Certification of Compliance of GUSA Licensee, LLC with the Commission's rules governing the use of Customer Proprietary Network Information ("CPNI"). Should there be any questions concerning this matter, please contact the undersigned.

Sincerely yours,



Josh Roland  
Counsel to GUSA Licensee, LLC

cc: Best Copy and Printing (via e-mail)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 23, 2009

Name of company covered by this certification: Globalstar USA, LLC (FCC license held by GUSA Licensee LLC)

Form 499 Filer ID: 820826

Name of signatory: William F. Adler

Title of signatory: Assistant Secretary

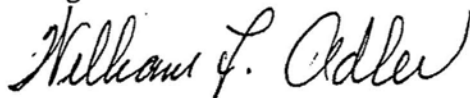
I, William F. Adler, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed

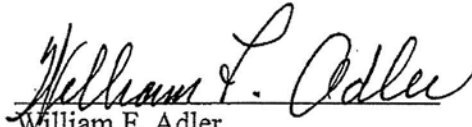
A handwritten signature in cursive script that reads "William F. Adler". The signature is written in dark ink and is positioned below the "Signed" label.

**CERTIFICATION OF CPNI FILING  
OF GLOBALSTAR USA, LLC**

**February 23, 2009**

On behalf of Globalstar USA, LLC ("GUSA"), I hereby certify that I have personal knowledge that GUSA complies with the Commission's rules governing the use of Customer Proprietary Network Information, 47 C.F.R. §§ 64.2001 *et seq.*

To the extent that it is not exempt from the Commission's rules by virtue of being a Mobile Satellite Services provider under 47 C.F.R. Part 25, GUSA is classified as a CMRS carrier for most purposes. GUSA does not use, disclose, or permit access to individually identifiable customer proprietary network information except as permitted under the Commission's rules. GUSA posts its basic policies and procedures with respect to subscriber CPNI on its Internet site. GUSA has only one affiliate that markets and sells Mobile Satellite Services and equipment in the United States over the Globalstar Satellite System. GUSA markets this other service, which is the same category of service as GUSA's services, to its subscribers on behalf of its affiliate and does not share subscriber CPNI with its affiliate. Except as noted herein, GUSA refrains from outbound marketing of service offerings to its subscribers; rather, GUSA only responds to inbound inquiries from subscribers who contact GUSA's customer care center or who respond to bill inserts and Internet postings. In the course of responding to inbound inquiries, GUSA complies with all of the relevant provisions of 47 C.F.R. §§ 64.2001 *et seq.*



William F. Adler

Member, Board of Managers, and  
Assistant Secretary